

From: [John Lublinkhof](#)  
To: [Dan Peacock/DC/USEPA/US@EPA](#)  
Subject: Fwd: Re: SLN's and Rodenticide Mitigation  
Date: 02/24/2011 05:35 PM

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Dear Dan,

I see that you were copied on the attached message from Rusty. Since the SLN label, P.C.Q. (CA780146) has both field and commensal uses, could we simply delete the commensal uses? Please advise.

Thanks,

John Lublinkhof  
Bell Laboratories, Inc.  
608-241-0202 Ext. 3138

-----Original Message-----

From: Wasem.Russell@epamail.epa.gov  
To: "John Lublinkhof" <jlublinkhof@belllabs.com>  
Date: Thu, 24 Feb 2011 17:02:03 -0500  
Subject: Re: SLN's and Rodenticide Mitigation

Hello John,

Sorry for the slow reply on this. Did the cited product go through reregistration? It seems like that would have required it to be restricted use given the field uses and if this is a restricted use pesticide. As I previously mentioned, we were under the impression there weren't SLN's for commensal use rodenticides, but it appears that P.C.Q. (CA780146) has some commensal uses. Since this product does have a commensal use, then it should conform to the RMD.

I am still waiting to hear more information regarding your sewer question. I will provide a response to that early next week.

Regards,

Rusty\_\_\_\_\_

Rusty Wasem / Chemical Review Manager  
Risk Management & Implementation Branch 1\*  
Pesticide Re-evaluation Division\* / Office of Pesticide Programs  
703 / 305 6979

From: "John Lublinkhof" <jlublinkhof@belllabs.com>  
To: Russell Wasem/DC/USEPA/US@EPA  
Date: 02/21/2011 03:06 PM  
Subject: SLN's and Rodenticide Mitigation

Dear Rusty,

I need further clarification regarding SLN's and Rodenticide Mitigation.

Your answer from April is straight forward. However, we do have a structural use as part of an SLN label in California (EPA SLN No. CA 780146, Calif. Reg. No. 12455-50003-AA Product Name: P.C.Q. (active ingredient diphacinone. This label is primarily for use against California ground squirrels (general field) but it also has deer mice (for use in forests), house mice (general indoor and outdoor use including structural) and meadow mice (general outdoor).

Am I safe to assume that this product is not affected by the mitigation? I look forward to hearing back from you since this question has been posed by a few county offices in California.

Thanks,

John Lublinkhof  
Bell Laboratories, Inc.  
608-241-0202 Ext. 3138

-----Original Message-----

From: Wasem.Russell@epamail.epa.gov  
To: "John Lublinkhof" <jlublinkhof@belllabs.com>  
Date: Fri, 17 Apr 2009 15:57:00 -0400  
Subject: Re: Rodenticide Mitigation

Good Afternoon John,

It wasn't required that the SLNs be put on the 90 day response. We are under the impression there aren't any SLNs for commensal use and therefore they would not be affected by the RMD.

Have a Great Weekend,

Rusty\_\_\_\_\_

Rusty Wasem

Chemical Review Manager  
Special Review & Reregistration Division  
Office of Pesticide Programs  
(703)305-6979

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| "John Lublinkhof" <jlublinkhof@belllabs.com>

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| To: |  
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| Russell Wasem/DC/USEPA/US@EPA

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| Date: |  
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| 04/16/2009 03:24 PM

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| Rodenticide Mitigation

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Rusty,

I trust all is well. In reviewing the information I sent in the 90 day response in September 2008, I did not include the SLN registrations. Was I supposed to? I see that some other companies did.

Best regards,

John Lublinkhof, Ph.D.  
Director of Regulatory Affairs  
Bell Laboratories, Inc.  
608-241-0202 Ext. 3138